
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Edward S. Kiel, U.S.M.J.
 :
 v. : Mag. No. 20-15071
 :
 SARAH B. STROGER :
 :
 : **CRIMINAL COMPLAINT**
 :

I, Task Force Officer Craig Fink, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Drug Enforcement Administration, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:



Craig Fink, Task Force Officer
U.S. Drug Enforcement Administration

Sworn to before me and subscribed in my presence,
March 4, 2020 in Newark, New Jersey.

HONORABLE EDWARD S. KIEL
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

(Conspiracy to Distribute Methamphetamine)

In or around March 2020, in Monmouth County, in the District of New Jersey and elsewhere, the defendant,

SARAH B. STROGER,

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Craig Fink, am a Task Force Officer with the Drug Enforcement Administration ("DEA"), and I am fully familiar with the facts set forth herein based on my own investigation and my conversations with other agents and members of law enforcement, and my review of their reports and of items of evidence. Where statements of others are related herein, they are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Since this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

1. Since in or around January 2020, law enforcement has been involved in an investigation of a drug trafficking organization ("DTO") known to distribute methamphetamine in Monmouth County, New Jersey, and elsewhere. Additionally, during the conspiracy, law enforcement has seized more than 50 grams of actual methamphetamine from members of the DTO.

2. During the investigation, law enforcement learned that defendant Sarah B. Stroger ("STROGER") is a member of the DTO. Moreover, as part of the investigation, law enforcement learned that a co-conspirator, Jason M. Heid ("Heid") is a member of the DTO who distributes methamphetamine. Between in or around January 2020 through in or around February 2020, Heid engaged in a series of controlled narcotics purchases with a co-conspirator ("Co-Conspirator-1") and a cooperating source ("CS") who, unbeknownst to Heid, was working at the direction and control of law enforcement. With respect to each of these transactions, Heid provided narcotics to Co-Conspirator-1 to provide to the CS. These narcotics were subsequently laboratory tested. Based on the results of the laboratory testing, in total of the course of these transactions, Heid sold the CS more than 50 grams of actual methamphetamine (*i.e.*, d-Methamphetamine Hydrochloride). With respect to each of these controlled purchases, the methamphetamine had a purity of at least 91 percent.

3. On or about March 4, 2020, as part of the aforementioned investigation, law enforcement conducted a lawful search of Heid's residence in Ocean Grove, New Jersey (the "Ocean Grove Residence").¹ Upon entering the Ocean Grove Residence to execute the search warrant, law enforcement discovered STROGER in the living area of the Ocean Grove Residence. As a result of the lawful search of the Ocean Grove Residence, law enforcement found and seized

¹ On or about March 2, 2020, the Honorable Joseph A. Dickson executed an application for a search warrant of the Ocean Grove Residence (*see* Mag. No. 20-2091). Heid was charged by a separate complaint with conspiracy to distribute methamphetamine, in violation of 21 U.S.C. 846 (*see* Mag. No. 20-8090).

approximately 100 grams of a substance that field-tested positive for the presence of methamphetamine.

4. After law enforcement *Mirandized* STROGER, STROGER told law enforcement that she possessed methamphetamine at her residence in Asbury Park, New Jersey, where she lives alone (the “Asbury Park Residence”). She further indicated to law enforcement that she keeps the methamphetamine at the Asbury Park Residence for her boyfriend, who distributes it. Moreover, STROGER consented, verbally and in writing, to a search of the Asbury Park Residence.

5. As a result of the lawful search of the Asbury Park Residence, law enforcement found and seized approximately 250 grams of a substance that field-tested positive for the presence of methamphetamine.